

Detox Catwalk 2016 – further details on companies

Glossary of terms

IPE – Institute of Public and Environmental Affairs, China¹

MRSL – Manufacturing Restricted Substances List

PFCs – per and poly fluorinated chemicals

ZDHC – Zero Discharges of Hazardous Chemicals Group (see [Collaboration – link](#))

For full background details for criteria see Criteria Explained [\(link\)](#)

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¹ The IPE online platform (based in China) is an existing well known and independent relational, and publicly accessible, database including a section that provides voluntarily disclosed data on company emissions, consumptions and pollutant discharges and also discharges and emissions of hazardous chemicals searchable by facility name, activity, date, location and/or individual pollutant. The Internet platform has direct data entry with the necessary procedures for security and data verification.

The IPE disclosure platform is used to ensure the discharges data of various supplier facilities are easily accessible, centralized and searchable via consistent credible content and form. These data may additionally be shared via the brand and supplier’s website. But, these additional forms of data distribution will not be a substitute/replacement for China supplier disclosure via the IPE platform. IPE is an independent non-profit, non-governmental organisation that, on occasion, may also work on similar issues as Greenpeace.

See: http://www.ipe.org.cn/En/pollution/discharge_detox.aspx

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Company details – A-Z

Adidas – Evolution Mode

Detox 2020 plan: Adidas is still using the ZDHC’s MRSL v.1.1 which is not hazard-based, not transparent and lacks wastewater testing detection limits and some key groups, such as PFCs. Even though adidas’s own programme has some positive elements, such as its reference to a ‘clean factory’ approach, proactive chemicals management and suppliers engagement tools, it is undermined by the fundamentally flawed ZDHC MRSL.

PFC Elimination: Adidas reports that 93% of products sold by end of 2016 will be PFC free, towards its target of 99% of its products by the end of 2017. It has committed to publish a case study which it is already working on but needs to ensure that a full hazards profiling of the alternatives is included in this.

Transparency: Adidas reports since the end of 2015, 50% of its global wet process suppliers have disclosed Detox data on the IPE platform, which will increase to 80% by September 2016. Adidas also discloses its suppliers list for both Tier 1 and Tier 2. It has committed to publish a discharges analysis report and provides a brief overview of findings; this should also include a root cause analysis of the source of any contamination. Although adidas originally sampled its wastewater after it had been treated, it states that “in order to confirm the effectiveness of our holistic chemical management program we will pilot testing of waste water intake prior the wastewater treatment process”.

Recommendations: Adidas needs to set its own individual MRSL, for example using the scope of the Bluesign list which it already works with, to implement an ambitious clean factory programme. This should be derived from a hazard based screening methodology for the selection of chemicals for elimination, including “phase-out substances” with associated timelines, beyond the first eleven groups and the limited additions made by the ZDHC. Given the fast pace of innovation on alternatives to PFC water repellents, adidas should consider tackling the usage of PFCs for the remaining 1% of its products and accelerate its complete phase-out of these hazardous chemicals. It also needs to provide its customers with information on which of its products contain PFCs and which are PFC free.

Useful links:

Progress Report on Chemical Management, May 2016:

http://www.adidas-group.com/media/filer_public/b9/d0/b9d04522-4a1e-4ae6-9bd8-fb6ba40a3849/adidas_group_progress_report_on_chemical_management_may_2016.pdf

Adidas Chemical Footprint page : <http://www.adidas-group.com/en/sustainability/planet/chemical-footprint/>

Adidas Group Policy for the Control and Monitoring of Hazardous Substances, September 2015:
http://www.adidas-group.com/media/filer_public/02/26/0226e6ad-e797-4f56-bf2c-15f4d1308fc1/a-01_sept_1st_2015_handout.pdf

Chemicals Management at the adidas Group, 2014:
http://www.adidas-group.com/media/filer_public/2014/06/10/adidas_group_chemical_management_2014_en.pdf

Adidas Global Factory List of Suppliers, May 2016:
http://www.adidas-group.com/media/filer_public/e1/be/e1bea106-29a3-41bd-8546-7d23108bc578/t2_suppliers_may_2016.pdf

Benetton – Avant-Garde

Detox 2020 Plan: Benetton has developed its own MRSL which enforces its ban on the 11 hazardous chemical groups and beyond. It includes many positive elements such as good wastewater testing limits and it defines its 'clean factory' approach which it applies to the whole suppliers' factory – not just to Benetton's production. However, there are some details missing particularly on the update and application of its screening methodology for hazardous chemicals.

PFC Elimination: Benetton achieved its commitment to eliminate PFCs by the end of December 2015, it also provides details on the process that was undertaken as well as its investigation into PFCs in products and its' supply chain. To ensure that PFCs were not replaced with other problematic chemicals, alternatives are tested against hazard criteria.

Transparency: Benetton has met all of its commitments to disclose discharge data on hazardous chemicals so far and continues to make good progress towards its' longer term goal. It also provides information on its monitoring of wastewater discharges, publishing full details of the suppliers that were tested. It needs to take this one step further and publish a full suppliers list.

Recommendations: To improve on its Detox 2020 plan Benetton needs to make the screening methodology it uses to select hazardous chemicals for its list more transparent and to update it regularly. It also now needs to expand on the PFC investigations it has done in a full case study to be published on Subspot. To further improve on transparency, Benetton should now publish a full suppliers list, which should include at least its major wet processes.

Useful links:

Benetton detox page:
<http://www.benettongroup.com/sustainability/detox/>

Benetton Restricted Substances List (RSL), March 2016:
http://assets.benettongroup.com/wp-content/uploads/2016/05/Benetton_Restricted_Substances_List.pdf

Benetton guidelines for Restricted Substances List (RSL) to suppliers and sub-suppliers:

http://assets.benettongroup.com/wp-content/uploads/2016/05/Benetton_RSL_Guidelines_201605_eng.pdf

Benetton positive lists from 3 chemical suppliers:

<http://www.benettongroup.com/sustainability/detox/restricted-substances-list/positive-lists/>

Benetton PFCs investigation report, December 2015: http://assets.benettongroup.com/wp-content/uploads/2016/05/Benetton_PFCs_Investigation_.pdf

Benetton Investigation report on APEOs, July 2013:

http://assets.benettongroup.com/wp-content/uploads/2016/05/Benetton_APEO_Investigation.pdf

Substitution case-study to replace acrylic resins and additives http://assets.benettongroup.com/wp-content/uploads/2016/05/Benetton_Cross_Checked_en_0.pdf

Benetton PFCs elimination progress, April 2016: http://assets.benettongroup.com/wp-content/uploads/2016/05/Benetton_PFCs_Elimination_Progress_201604.pdf

Benetton APEOs/APs elimination progress, April 2016:

http://assets.benettongroup.com/wp-content/uploads/2016/05/Benetton_APEOs_Elimination_Progress_201604.pdf

Benetton wet process screening methodology: Testing regime:

<http://www.benettongroup.com/sustainability/detox/restricted-substances-list/wet-process-screening-methodology/>

Environmental impacts research and smart monitoring strategy development focused on the DETOX Programme, March 2016:

http://assets.benettongroup.com/wp-content/uploads/2016/05/Ca_Foscari_Technical_Report.pdf

APEOs/APs Elimination Progress, April 2016:

http://assets.benettongroup.com/wp-content/uploads/2016/05/Benetton_APEOs_Elimination_Progress_201604.pdf

Burberry – Evolution Mode

Detox 2020 plan: Burberry describes its “clean factory” approach which includes effluent tests and provides significant guidance and training for its suppliers on implementing its Detox plans. However, Burberry should communicate this approach to its supply chain and translate it into its MRSL by adding wastewater limits. Despite the addition of PFCs, its use of the ZDHC’s MRSL with its fundamental flaws is insufficient to achieve its Detox Commitment.

PFC elimination: Burberry has recently achieved its target to eliminate all PFCs, in line with its commitment; it now needs to publish a case study documenting this process as well as show transparent hazard assessment of the alternatives.

Transparency: Burberry states that effluent testing data has been published on IPE and on its own website, for over 80% of its global wet processing suppliers and facility level testing is published on its

own website; however, the reporting isn't broken down by region. Burberry needs to ensure its suppliers continue to report their Detox data regularly.

Recommendations: To improve its Detox 2020 plan, Burberry needs to create its own MRSL which proactively uses a hazard based screening methodology to select chemicals for elimination, beyond the first eleven groups and the limited additions made by the ZDHC. Burberry needs to commit to publishing a case study on its experience with substituting PFCs. It also should provide a more detailed breakdown of its suppliers Detox data and publish a list of its suppliers, which needs to include its major wet processing suppliers.

Useful links:

Burberry Commitment On Chemical Management In Manufacturing:

http://www.burberryplc.com/corporate_responsibility/our_product/burberry-commitment-on-chemical-management-in-manufacturing

Burberry Action Plan on Chemical Management in Manufacturing:

http://www.burberryplc.com/corporate_responsibility/our_product/burberry-commitment-on-chemical-management-in-manufacturing/burberry-action-plan-on-chemical-management-in-manufacturing

Burberry annual progress report, May 2016: <http://www.burberryplc.com/documents/action-plan/burberry-annual-progress-review-2016.pdf>

Burberry Manufacturing Restricted Substances List (MRSL) and Implementation guidelines, January 2016: http://www.burberryplc.com/documents/action-plan/burberry_manufacturing_restricted_substances_list_2016.pdf

Burberry Product Restricted Substances List (PRSL), January 2016:

http://www.burberryplc.com/documents/action-plan/burberry_product_restricted_substances_list_2016.pdf

Burberry global water testing results overview, March/April 2016:

<http://www.burberryplc.com/documents/action-plan/burberry-disclosure-water-test-overview.pdf>

Burberry global water testing results summary, March/April 2016:

<http://www.burberryplc.com/documents/action-plan/burberry-disclosure-water-test-summary.pdf>

C&A – Evolution Mode

Detox 2020 plan: C&A has improved its chemicals management system which sets out its own wastewater testing standards for hazardous chemicals in wastewater. It also refers to its 'clean factory' approach. However, it still relies on the inadequate screening methodology behind the ZDHC's MRSL which has fundamental flaws as a result.

PFC elimination: C&A successfully eliminated PFCs from its products in January 2015. It plans to write a case study to be published on Subsport and provides information on PFC-free alternatives to use. However, it is not clear if these have been subject to a hazardous screening methodology.

Transparency: C&A provides a detailed update on the reporting of data by its suppliers on the IPE online platform, broken down by the regions reported and with targets for increasing the percentage of suppliers reporting. It also provides a wastewater testing report which it aims to do annually and has published a list of its main suppliers with a commitment to include wet processors by 2017.

Recommendations: To improve its Detox 2020 plan, C&A needs to proactively use a hazard based screening methodology to select chemicals for elimination, including “phase-out substances” with associated timelines, beyond the first eleven groups and the limited additions made by the ZDHC. It also needs to publish its case study on the elimination of PFCs which includes hazardous screening. C&A needs to maintain the momentum on its transparency programme and keep pushing for improvements on the elimination of hazardous chemicals in its supply chain.

Useful links

C&A Global Sustainability Report 2015, “material impact”:
<http://materialimpacts.c-and-a.com/>

C&A Global Sustainability Report 2015, “clean environment”: <http://materialimpacts.c-and-a.com/sustainable-supply/clean-environment/>

C&A Global Sustainability Report 2015, “clean environment in our supply chain”
<http://materialimpacts.c-and-a.com/sustainable-supply/clean-environment/clean-environment-in-our-supply-chain/>

C&A Supply Chain Management Progress Report, May 2016: http://materialimpacts.c-and-a.com/fileadmin/user_upload/SCM_Progress_Report.pdf

C&A Chemical Policy, includes Material Restricted Substance List (MRSL) and Product Restricted Substances List (PRSL), August 2016: http://materialimpacts.c-and-a.com/fileadmin/user_upload/SCM_C_A_Chemical_Policy_RSL_and_MRSL_website_24.05.2016.pdf

C&A wastewater discharges trend report, May 2016: http://materialimpacts.c-and-a.com/fileadmin/user_upload/SCM_C_A_Discharge_Data_Summary_final.pdf

Esprit – Faux Pas

Detox 2020 plan: Esprit’s programme to implement its Detox Commitment is highly dependent on the ZDHC, and in particular relies on the MRSL v1.1 which has fundamental flaws is insufficient to achieve its Detox Commitment. Esprit also shows that it misunderstands its own role in the chain of responsibility for Detox, when it states that suppliers are contractually obliged to eliminate the more hazardous chemicals when “less toxic or non-toxic substitutes ... are found”.

PFC Elimination: Esprit has successfully eliminated PFCs from its products by August 2014 and states that it is closely monitoring the enforcement of its ban. However, it has not yet published a case study and needs to make a commitment to document the process of eliminating PFCs, which should include an elaboration of its hazard assessment of alternatives.

Transparency: Esprit has shifted its focus, stating that is working with its supply chain to “substitute and promote better chemistry in order to make sure that chemicals are removed at the beginning of the

process before they end up in the factory's wastewater". As a result, it appears that it is no longer ensuring that its suppliers publish their Detox data online. However, by deciding to de-prioritise wastewater testing it is missing a vital safety net for checking all sources of hazardous chemicals in a facility, which then need to be tracked back to find the actual source. It is also shirking its responsibility to the public and its customers for transparent disclosure of its discharges of hazardous chemicals.

Recommendations: Esprit needs to take individual responsibility for its Detox programme by creating its own MRSL and implementing a "clean factory" approach including wastewater testing as an important tool, which is applied to the suppliers' whole factory – not just to its own production. It should also make a commitment to document the process of eliminating PFCs in a case study, which should include an elaboration of its hazard assessment of alternatives. Esprit must urgently re-evaluate its approach of ignoring wastewater discharges and transparency to the public, which is an essential part of its Detox Commitment.

Useful links:

Esprit Sustainability page:

<http://www.esprit.com/company/sustainability/>

Esprit Agreement with Greenpeace, December 2012:

http://www.esprit.com/press/ESPRIT_Greenpeace_Detox_Solution_Commitment.pdf

Esprit Detox Commitment update, December 2014:

http://www.esprit.com/download.php?component_id=62249&download_id=2

Esprit Detox Commitment update, May 2016:

http://www.esprit.com/press/20160530_DetoxCommitment_Update.pdf

Esprit Sustainability Report 2014-

2015: <http://www.esprit.com/press/sustainabilityreport/GRI201415.pdf>

Esprit Sustainability in practice page:

http://www.esprit.com/company/sustainability/sustainability_in_practice/

Fast Retailing (Uniqlo) – Evolution Mode

Detox 2020 plan: Fast Retailing takes individual responsibility for its chemicals management programme by publishing its own individual MRSL which is based on a transparent screening methodology and is updated annually. It implements the "no safe level" requirement by using the best current testing techniques.

PFC elimination: Fast Retailing reports that it has eliminated PFCs from 98% of its products; it has specified in which products and has published a (still incomplete) case study on its own website about some of the substitutes it has used. Although its initial target was to eliminate all remaining PFC use by no later than 01 July 2016, Fast Retailing has submitted a credible revised timeline communicating that all products put on shelves for 2017 Fall/Winter collections should be free of PFCs. However, Fast Retailing needs to be clear that it will continue its positive approach of making functional sacrifices where necessary (as done for current PFCs substitution).

Transparency: Fast Retailing was originally a pioneer on transparency for ensuring that 80% of its suppliers reported the Detox data online, however, this does not appear to have been updated recently, although it is undertaking regular wastewater testing.

Recommendations: Fast Retailing needs to adopt a ‘clean factory’ approach which would be applied to the supplier’s whole factory, not just to its own production lines and present the dates for its elimination targets and phase outs more clearly. Given the fast pace of innovation on alternatives to PFC water repellents Fast Retailing should accelerate its phase out of these hazardous chemicals in the remaining products and in the meantime, provide its customers with information on which of its products contain PFCs and which are PFC free. Fast Retailing also should ensure the publication of data by its suppliers on an ongoing basis as well as its suppliers list, including at least it’s wet process suppliers.

Useful links:

Fast Retailing Initiatives to Eliminate the Release of Hazardous Chemicals, main website:

<http://www.fastretailing.com/eng/csr/environment/zero.html>

Fast Retailing Detox Commitment with Greenpeace:

http://www.fastretailing.com/eng/csr/environment/pdf/detox_solution_commitment_eng.pdf

Fast Retailing Steps to Develop Substitution Case Studies and the Intrinsic Hazards Screening Methodology:

http://www.fastretailing.com/eng/csr/environment/pdf/casestudy_screeningmethodology_eng.pdf

Fast Retailing Progress Report, January 2015:

http://www.fastretailing.com/eng/csr/environment/pdf/Individual_action_eng.pdf

Fast Retailing Corporate Social Responsibility Report 2016:

http://www.fastretailing.com/eng/csr/report/pdf/csr2016_e.pdf#page=1&pagemode=thumbs&zoom=80

Fast Retailing Hazardous Chemicals Screening Methodology:

http://www.fastretailing.com/eng/csr/environment/pdf/Screening_Methodology_en.pdf

Fast Retailing Restricted Substances List (MRSL):

http://www.fastretailing.com/jp/csr/environment/pdf/restricted_substances_list_20160229.pdf

Fast Retailing PFC substitution case study:

http://www.fastretailing.com/eng/csr/environment/pdf/pfc_eng.pdf

Fast Retailing All-Product Recycling Initiative:

<http://www.fastretailing.com/eng/csr/environment/recycle.html>

Fast Retailing All-Product Recycling Future Expansion:

<http://www.fastretailing.com/eng/csr/environment/recycle03.html>

G-Star – Evolution Mode

Detox 2020 plan: G-Star has its own MRSL which is almost completely derived from the ZDHC MRSL v1.1; however, it does make some slight improvements in the form of some additional chemicals, adding details that the ZDHC misses more protective Detection Limits. However, its use of the ZDHC's MRSL which is not hazard-based and therefore has fundamental flaws is holding G-Star back.

PFC elimination: G-Star reports that as of January 2015 all of its garments are PFC free, in line with its commitment. It has also published two case studies on the substitution of PFCs on Subsport, although it needs to include a hazard assessment of the alternatives being used.

Transparency: G-Star reported Detox data from 80% of its suppliers in 2013 and although there has been no reporting since, it plans to publish new data between October and December 2016. It also has a suppliers list in the form of an interactive map; this is an interesting innovation which allows customers to access its direct suppliers through a "where is it made" button on its online shop. However, tier2 suppliers are not included and it doesn't disclose the details of suppliers submitting Detox data on IPE.

Recommendations: G-Star needs to create its own MRSL which proactively uses a hazard based screening methodology and implements a "clean factory" approach which would be applied to the supplier's whole factory, not just to its own production lines. To continue progressing on PFC-free alternatives it should ensure hazard assessments of the alternatives being used. It also needs to include its wet processing suppliers in its suppliers list and provide updated discharge analysis reports on the new data from its suppliers when Detox data is reported later this year.

Useful Links:

G-Star Corporate Responsibility page: https://www.g-star.com/en_nl/corporate/responsibility/responsible-supply-chain/index.htm

G-Star Environmental guidelines May 2016: [https://www.g-star.com/Images/G-Star%20Environmental%20Guideline%20%201.0%20\(May%202016\)_tcm13-21733.pdf](https://www.g-star.com/Images/G-Star%20Environmental%20Guideline%20%201.0%20(May%202016)_tcm13-21733.pdf)

G-star Detox solution commitment with Greenpeace, January 2013: https://www.g-star.com/Images/6.%20G-Star%20Detox%20Solution%20Commitment%2029%20January%202013_tcm13-1795.pdf

G-Star Commitment to zero discharge of hazardous chemicals, March 2012: https://www.g-star.com/Images/9.%20120326%20Zero%20Discharge%20Statement%20FINAL_tcm13-1798.pdf

G-Star zero discharge of hazardous chemicals progress report 2015 - May 2016: https://www.g-star.com/Images/160404%20G-Star%20DETOX%20Progress%20Report%202015_tcm13-21735.pdf

G-Star Manufacturing Restricted Substances List (MRSL), October 2014: https://www.g-star.com/Images/G-Star%20MRSL%20Version%201%200%20October%202014_tcm13-5620.pdf

G-Star Manufacturing Restricted Substances List (MRSL), March 2016: https://www.g-star.com/Images/16110039%20MRSLMarch%202016_tcm13-21730.pdf

G-Star Case-study on PFC-free alternatives for water repellent textile finishes: https://www.g-star.com/Images/PFC-free%20alternatives%20for%20water%20repellent%20textile%20finishes_tcm13-5554.pdf

G-Star Root cause investigation of PFOS contaminations in leather garments: https://www.g-star.com/Images/Case%20Study%20-%20Subsport%20-%20Root%20cause%20investigation%20PFOS%20in%20leather%20garments_tcm13-21732.pdf

G-Star Manufacturing Map: https://www.g-star.com/en_nl/corporate/responsibility/manufacturing-map

H&M – Avant-Garde

Detox 2020 plan: H&M has a clear and comprehensive 2020 fit MRSL that has been updated in 2016, based on a transparent hazard-based screening method. It uses the best available technical detection levels for both wastewater (and formulations) and includes further commonly used hazardous chemicals beyond the initial 11 groups of hazardous chemicals. The MRSL is applied in H&M's supply chain using a Clean Factory approach with a commitment to set timelines from 2017, ahead of its 2020 deadline.

PFC elimination: H&M was the first brand to eliminate the hazardous chemicals PFCs from its products, setting the standard. However, it has not yet delivered on its commitment to provide a PFC substitution case study and a hazard assessment of the alternatives.

Transparency: H&M is setting an example of good practice by disclosing a comprehensive list of suppliers, which includes tier 2. It also confirms that 46% of its wet process facilities have published data on the discharge of hazardous chemicals on a global online platform; these facilities are owned by its strategic first tier suppliers in the global south, although this is not clear what proportion of H&M's overall global wet processing this corresponds to.

Recommendations: H&M must now follow through on its commitment to provide a PFC substitution case study and a hazard assessment of the alternatives, to help expedite the elimination of PFCs by other brands and through regulation. It also needs to make a time-bound commitment for increasing the percentage of suppliers reporting their Detox data online, to 80% of its global wet process suppliers, with the priority in China.

Useful links

H&M towards zero discharge on hazardous chemicals:
<http://sustainability.hm.com/en/sustainability/commitments/use-natural-resources-responsibly/towards-zero-discharge.html#cm-menu>

H&M Commitment to zero discharge on hazardous chemicals, 2011:
<http://sustainability.hm.com/en/sustainability/commitments/use-natural-resources-responsibly/towards-zero-discharge/hm-commitment-to-zero-discharge-of-hazardous-chemicals.htm>

H&M screening methodology of Manufacturing Restricted Substances List (MRSL):
<http://sustainability.hm.com/content/dam/hm/about/documents/masterlanguage/CSR/Others/G.HM%20MRSL%20Screening%20Methodology.pdf>

H&M Chemical Restrictions, Manufacturing Restricted Substances List (MRSL):

http://sustainability.hm.com/content/dam/hm/about/documents/masterlanguage/CSR/2015%20Sustainability%20report/H.HM%20Chemical%20Restrictions%20%20May%202016_Manufacturing%20Restricted%20Substa....pdf

H&M Approved alternatives to

PFCs: <http://sustainability.hm.com/content/dam/hm/about/documents/masterlanguage/CSR/Policies/Approved%20alternated%20to%20PFC%20version%207.pdf>

H&M Discharge data, summary report, 2016

<http://sustainability.hm.com/content/dam/hm/about/documents/masterlanguage/CSR/2015%20Sustainability%20report/C.Discharge%20data%202016.pdf>

H&M supplier factory list: <http://sustainability.hm.com/en/sustainability/downloads-resources/resources/supplier-list.html>

Disclosure Calculation Model (E cube), summary report 2014:

<http://sustainability.hm.com/content/dam/hm/about/documents/masterlanguage/C>

H&M's approach to hazardous chemicals in recycled materials:

<http://sustainability.hm.com/content/dam/hm/about/documents/masterlanguage/CSR/2015%20Sustainability%20report/H%26M's%20approach%20to%20hazardous%20chemicals%20in%20recycled%20materials.pdf>

European waste hierarchy:

<http://ec.europa.eu/environment/waste/framework/>

H&M conscious materials:

<http://about.hm.com/en/About/sustainability/hot-topics/more-sustainable-materials.html>

Inditex (Zara) – Avant-Garde

Detox 2020 plan: Inditex has a comprehensive and well explained chemicals management programme with an extensive 'List' (MRSL) of hazardous chemicals beyond the original 11 groups targeted for elimination. It outlines its 'clean factory approach' in which it "recognizes that the best and more thorough approach to achieve this goal is by "cleansing" the manufacturing units of the supply chain - implemented in the supply chain mainly through three programs pioneered by Inditex" addressing respectively products, suppliers' environmental performance and chemical suppliers' contamination management. Its methodology for screening new chemicals is detailed, but a few concerns remain about the toxicological assumptions and decision-making behind its criteria for selecting and prioritising chemicals, which need to be transparently aligned with best practice.

PFCs elimination: Inditex delivered on its commitment to eliminate PFCs within its timeline; it has documented the process of substitution in case studies and provided details of its assessment of the alternatives for functionality and for toxicity, although the latter is limited to in-house comparative toxicological tests which do not account for all hazardous properties and endpoints.

Transparency: Inditex is ensuring that its suppliers disclose their discharges of hazardous chemicals publicly. It also has an ambitious monitoring programme which it presents in its wastewater analysis report as well as a programme to investigate and analyse the root causes of contamination with

hazardous chemicals in wastewater or products. It has published a list of its suppliers which includes both direct and indirect wet suppliers and will expand this in future.

Recommendations: Inditex still needs to ensure that its screening methodology is transparently aligned with best practice, which should inform the assumptions behind its criteria for prioritising chemicals. It needs to use a broader hazard based methodology and expand the assessment of PFC alternatives to get a better picture of the environmental and health impacts of the preferred substitutes.

Useful links

Inditex Global Water Management Strategy:

<http://www.wateractionplan.com/>

Inditex Detox 2020 webpage:

<http://www.wateractionplan.com/web/gestion-del-agua/inditex-detox-2020>

Inditex perspective on sustainable and responsible manufacturing, May 2016:

http://www.wateractionplan.com/documents/186210/199857/1.SUSTAINABLE+AND+RESPONSIBLE+MANUFACTURING_MAY_2016.pdf/4a8b0672-d1b7-4c9a-9eb7-b3e3a6766f01

Inditex methodology for the screening of substances to be used in manufacturing and accompanying policies: http://www.wateractionplan.com/documents/186210/199857/2.MethodologyfortheScreening_MAY_2016.pdf/18e2ce2a-e759-480d-ba63-048e5e90417f

Inditex introduction to the to Manufacturing Restricted Substances List (MRSL) May 2016:

http://www.wateractionplan.com/documents/186210/199857/3.Introduction+Inditex+MRSL_MAY_2016.pdf/78f9b868-954f-4159-8214-e2aff7ce5782

Inditex Manufacturing Restricted Substances List (MRSL) for wet processing units:

<http://www.wateractionplan.com/documents/186210/199857/4.INDITEX+MRSL.XLSX/d595ecbd-7c5a-4ea9-8d9d-0040137d7347>

Inditex studies toward the substitution of PFCs, case-study, May 2016:

http://www.wateractionplan.com/documents/186210/199857/5.1.STUDIES+TOWARD+THE+SUBSTITUTION+OF+PERFLUOROCARBONS_MAY_2016.pdf/2bcd134-4dfb-4b23-b280-0483ad7628e0

Inditex PFCs Progress Report, May 2016:

http://www.wateractionplan.com/documents/186210/199857/5.2.PFCs+Progress+Report_v1May2016.pdf/fd1d0107-9100-49e1-a403-bf4dfe60c1d0

Inditex, chemicals management activities report, May 2016:

http://www.wateractionplan.com/documents/186210/199857/6.4.CHEMICAL+MANAGEMENT+ACTIVITIES+REPORT_MAY2016.pdf/8ccb31fb-aad9-4709-a2a6-3350c2957801

Inditex supply chain wet processing units list, May 2016:

http://www.wateractionplan.com/documents/186210/199857/6.1.INDITEX+SUPPLY+CHAIN_WET_PROCESSING_v1May2016.pdf/90f1e765-5ca2-4cc3-9215-88e0f1cc12a4

Inditex wastewater analysis report on wet processing suppliers May 21016:

http://www.wateractionplan.com/documents/186210/199857/6.2.Waste+water+analysis+report_May_2016.pdf/d90674bf-18ea-4651-a9db-e6e4e2cb3a99

Inditex clean factory approach: root cause analysis toward the replacement of products containing APEOs:

http://www.wateractionplan.com/documents/186210/199857/6.3.Clean_Factory_Root+cause+analysis_replacement_v1May2016.pdf/71a8d935-b83e-48b0-b7de-371c28e9441c

Inditexwater action plan: <http://www.wateractionplan.com/web/gestion-del-agua/closing-the-loop>

Levis (LS & Co) – Evolution Mode

Detox 2020 plan: LS & Co states that it is piloting a hazard screening methodology but this has still to be published and implemented in its chemicals management communications - the main document for restricting hazardous chemicals in manufacturing (its M-RSL). Its own M-RSL has not been updated since July 2014, giving way to the ZDHC MRSL instead. This is a backwards step as the latter does not convey the full requirements of LS & Co's Detox plan to its supply chain, for example its ban on ALL PFCs.

PFCs elimination: LS & Co has achieved the elimination of PFCs by 2016 in line with the target set out in its commitment and has also published a case study which includes a hazard assessment of the substitute being used, although it does not include a comprehensive listing of all the PFC chemicals to be avoided in its MRSL. It also needs to continue researching substitutes for PFCs as its hazard assessment shows its preferred alternative is not ideal.

Transparency: LS & Co has ensured that the majority of its wet process suppliers report their data on hazardous chemical discharges on a global online platform and has also published analysis of the discharge data. However, LS & Co needs re-focus on its suppliers in China as no Detox data from them has been disclosed for the last two years.

Recommendations: LS & Co needs to take more individual responsibility for its Detox programme by updating its own list of hazardous substances which should implement the hazard screening methodology that it is piloting. It also should ensure its PFC ban is fully communicated to its supply chain through its MRSL. Finally needs to ensure continuous reporting of Detox data by suppliers and within certain regions to allow a consistent analysis of trends over time and include more specific information in its suppliers list to identify tier 2 wet process suppliers.

Useful links

LS & Co sustainability:

<http://www.levistrauss.com/sustainability/#planet>

Progress on Commitment to Zero Discharge of Hazardous Chemical:

<http://levistrauss.com/wp-content/uploads/2016/06/ZDHC-Progress-Update-2015.2.pdf>

LS & Co Restricted Substances Stewardship Programme (RSSL), July 2014: <http://levistrauss.com/wp-content/uploads/2014/10/RSSP-July-2014-Final.pdf>

LS & Co Restricted Substances List (RSL), July 2014: <http://levistrauss.com/wp-content/uploads/2014/09/July-2014-RSL-English.pdf>

LS & Co Phase out of APEOS, 2013: <http://lsc0.s3.amazonaws.com/wp-content/uploads/2014/01/LSCO-Phase-Out-of-Alkylphenol-Ethoxylates2.pdf>

LS & Co Restricted Substances Stewardship Programme (RSSL), for MRSL implementation, June 2015: <http://levistrauss.com/wp-content/uploads/2016/05/RSSP-June-2015-final.pdf>

LS & Co Manufacturing Restricted Substances List (MRSL) and zero discharge of hazardous chemicals (ZDHC) programme 2015: http://levistrauss.com/wp-content/uploads/2016/05/MRSL_v1_1.pdf

Hazard assessment pilot - article on bizNGO, October 2015: <http://www.bizngo.org/news/article/QA-bart-sights>

LS & Co case study on phase out of PFCs: http://www.levistrauss.com/wp-content/uploads/2016/05/160311_Case-Story_Levi-Strauss_May252016final.pdf

LS & Co Suppliers list March 2016: <http://www.levistrauss.com/wp-content/uploads/2016/03/Levi-Strauss-Co-Factory-List-March-2016.pdf>

Levis Pilot Study of Supplier Facility Chemical Use and Discharge (2013) http://www.levistrauss.com/wp-content/uploads/2013/02/Toward-Achieving-Zero-Discharge_Pilot-study-of-supplier-facility-chemical-use-and-discharge_May2013.pdf

Limited Brands (Victoria's Secret) – Faux Pas

Detox 2020 plan: While Limited Brands provides some engagement and training for its suppliers, its programme is limited and its use of the ZDHC's MRSL with its fundamental flaws is insufficient to achieve its Detox Commitment. Limited Brands needs to create its own MRSL which proactively uses a hazard based screening methodology to select chemicals for elimination, beyond the first eleven groups and the limited additions made by the ZDHC.

PFC elimination: Although Limited Brands made a commitment to eliminate all PFCs by July 2015 it has not provided a progress report to confirm whether this has been 100% achieved (it only states that has outlined the ban of the 11 priority chemical groups (including PFCs) to its suppliers.

Transparency: Limited Brands is following through on its commitment to ensure its suppliers publish data on the discharge of hazardous chemicals; 90% of its Chinese suppliers are reporting their wastewater discharges. It also provides a breakdown of trends from 2013 onwards. However, Limited Brands does not publish its list of suppliers and only tests wastewater after treatment, which doesn't monitor for compliance and progress on banned and phased out substances and doesn't account for the transfer of hazardous chemicals into sludges or filters.

Recommendations: It's time for Limited Brands to take individual responsibility for Detoxing its supply chain and increase the transparency of its Detox 2020 plan. Limited Brands also needs to provide a positive confirmation that it has completed the elimination of PFCs in line with its commitment and

publish a case study on the substitution of PFCs with safer alternatives which includes information on the hazard assessment of these alternatives. To ensure the credibility of its wastewater testing programme and to enable a root cause diagnosis and the environmental relevance of data reported by its suppliers, Limited Brands needs to do wastewater testing BEFORE treatment.

List of urls/ important documents

Limited Brands, Manufacturing, website.

<https://www.lb.com/responsibility/environment/water/manufacturing>

LIMITED BRANDS Greenpeace Detox Solution Commitment 15 January 2013 v1-1,

pdf: <https://www.lb.com/binaries/content/assets/pdfs/responsibility/environment/final-limited-brands-gp-detox-solution-commitment-15-january-2013.pdf>

ZDHC Zero Discharge of Hazardous Chemicals Programme, Manufacturing Restricted Substances List version 1.1, 2015, pdf.: http://www.roadmapzero.com/fileadmin/pdf/MRSL_v1_1.pdf

Oeko-Tex®, Limit values and fastness, website: https://www.oeko-tex.com/en/business/certifications_and_services/ots_100/ots_100_limit_values/ots_100_limit_values.html

Ecotextile article, Limited brands stops using PFCs, 04 August 2015:

<http://www.ecotextile.com/2015080421638/fashion-retail-news/limited-brands-stops-using-pfcs.html>

Limited brands, trend analysis, pdf:

https://www.lb.com/binaries/content/assets/pdfs/responsibility/environment/05_25_16-greenpeace-infographic_final.pdf

Limited brands, waste reduction, website:

<https://www.lb.com/responsibility/environment/waste-reduction--recycling>

Limited brands footprint, website:

<https://www.lb.com/responsibility/environment/footprint>

LiNing – Faux Pas

Detox 2020 plan: LiNing has a chemicals management programme for products in place and provides some information for suppliers, however, its programme is limited and its use of the ZDHC's MRSL with its fundamental flaws is insufficient to achieve its 2020 Detox Commitment.

PFC elimination: LiNing does not have a commitment to eliminate all uses of PFCs in all of its products; its commitment is limited to woven products only and up to only 95% of PFCs used in these products. It also has not made a public report on its progress towards this commitment.

Transparency: LiNing reports that it has delivered on its commitment to disclose data from 80% of its suppliers on a global online platform. LiNing needs to provide more information in the form of a discharge data report which would analyse trends as well as evidence of a root cause analysis to trace the sources of hazardous chemicals discharges. LiNing also has to start disclosing its list of tier 1&2 suppliers.

Recommendations: For LiNing not to break its commitment to Detox by 2020 it needs to create its own MRSL which proactively uses a hazard based screening methodology to select chemicals for elimination, beyond the first eleven groups and the limited additions made by the ZDHC. For its Detox plan to be credible, LiNing needs to make a new commitment to eliminate 100% of PFCs in all of its products. To improve on all criteria, a “clean factory” approach is needed, which requires a brand’s suppliers to apply Detox across their whole mill, not only for the brand’s products.

Useful Links

LiNing, Corporate Social Responsibility website

<http://ir.lining.com/en/csr/csr.php>

Corporate Social Responsibility report 2015 : <http://www.irasia.com/listco/hk/lining/annual/ar157600-e02331.pdf>

LiNing brand commitment:

http://ir.lining.com/en/csr/csr_reports/csr_commitment_2015.pdf

Mango – Evolution Mode

Detox 2020 plan: Mango has developed its own M-RSL which it updates regularly and it is very clear about its use of lowest available detection limits. It also implements a “clean factory” approach which it applies to a supplier’s whole factory, not just to its own production line.

PFCs elimination: Mango was among the first companies to eliminate the use of PFCs in line with its commitment; none of its products contain PFCs. It has committed to publish a case study documenting the process.

Transparency: Mango met its original deadline to publish data on the discharge of hazardous chemicals on the global online database IPE; it has since expanded the number of suppliers that report data but does not indicate where these are and what percentage of its supply chain is covered.

Recommendations: Mango needs to explain in more detail how it uses its screening methodology for selecting additional hazardous chemicals and there are some gaps in the new chemicals it has selected. When Mango publishes its case study on PFCs substitution, it needs to report on its hazard assessment of the PFC alternatives it is using. It should provide more details on the location and percentage of its supply chain that reports Detox data. Mango also needs to publish a suppliers list which includes its wet process suppliers.

Useful links

Mango webpage, Detox Project:

<http://www.mango.com/web/oi/servicios/company/rsc/detox.php>

Mango Detox Solutions Commitment:

<http://st.mngbcn.com/web/oi/servicios/rsc/pdf/IN/detox/Detox.pdf>

Mango Detox Roadmap 2015-2016

http://st.mngbcn.com/web/oi/servicios/rsc/pdf/IN/detox/8.ROADMAP_2015-2016.pdf

Mango screening methodology (2013)

<http://st.mngbcn.com/web/oi/servicios/rsc/pdf/IN/detox/2.Screening%20Methodology.pdf>

Mango Manufacturing Restricted Substances list (MRSL), May 2016:

http://st.mngbcn.com/web/oi/servicios/rsc/pdf/IN/detox/4.MRSL_may_2016.pdf

Mango Product Restricted Substances (PRSL):

<http://st.mngbcn.com/web/oi/servicios/rsc/pdf/IN/detox/prsl.pdf>

Livetrack Mango meeting, April 6th 10-13h:

<https://docs.google.com/document/d/1-ueF5Vp394L74S7QwqpUUSpTQESV74qKRRHxuKaL954/edit>

Mango Detox, Results 2015, trend analysis:

http://st.mngbcn.com/web/oi/servicios/rsc/pdf/IN/detox/7.Results_2015.pdf

M&S – Evolution Mode

Detox 2020 plan: M&S refers to a ‘clean factory’ approach and its programme has some positive elements such as mandatory disclosure of chemical inventories and its work with suppliers on implementation. However, its efforts are hampered by its use of the ZDHC’s MRSL with its fundamental flaws; M&S at least makes a slight improvement on the ZDHC MRSL by requiring the use of best available detection limits, which supports the fact that there are no safe levels of hazardous chemicals.

PFC elimination: M&S will achieve its objective of no-PFC use in its products in July 2016; in the meantime, existing stock made with PFC finishes will still be sold. However, M&S is not providing adequate information to its customers by labelling these clothes directly. It could use this opportunity to communicate the benefits of eliminating PFCs to its customers, particularly if there has been any loss in functionality such as oil repellency. M&S is applying a precautionary approach in its assessment of alternatives by avoiding the use of nanotechnology products.

Transparency: M&S has ensured that at least 80% of its suppliers in China (which represent 39% of its wet process suppliers) are disclosing Detox data on a global online platform and plans to extend this reporting to other regions. It is also publishing an interactive online list of its suppliers and should be encouraged to expand this to Tier 2 suppliers, at least wet processes. It has also undertaken monitoring of hazardous chemicals at various processing stages and has published the test results on IPE, however, this type of data should also form part of a discharges analysis report.

Recommendations: M&S needs to take more individual responsibility for its Detox programme by developing its own list of hazardous substances and implementing the requirement for “no safe levels” of hazardous chemicals. A commitment to publish a case study on the process of eliminating PFCs is also needed; this should show how alternatives undergo a hazard screening methodology and discuss the functionality of the substitutes. It also needs to expand its suppliers list to include at least wet processes.

Useful Links

M&S, Responsible Chemicals Management: <http://corporate.marksandspencer.com/plan-a/our-approach/clothing-and-home/product-standards/responsible-chemicals-management>

M&S detox commitment with Greenpeace, March 2012
<http://corporate.marksandspencer.com/documents/plan-a-our-approach/mands-detox-agreement-with-greenpeace-march2012.pdf>

M&S minimum standard manufacturing restricted list (MRLS), restricted substances list (RSL), May 2016:
<http://corporate.marksandspencer.com/file.axd?pointerID=7680a7ffdecf4ef38e52cd91828d5904>

M&S, Research and innovation section of the chemicals page:
<http://corporate.marksandspencer.com/plan-a/our-approach/clothing-and-home/product-standards/responsible-chemicals-management#e0dd3ae3199d4488a9918a73c09b2232>

M&S waste and circular economy: <http://corporate.marksandspencer.com/plan-a/our-approach/business-wide/waste-and-circular-economy>

Miroglio – Evolution Mode

Detox 2020 plan: Miroglio publishes its own MRSL with a comprehensive list of chemicals, however, it doesn't clarify the elements and steps of a transparent screening methodology for adding further hazardous substances. The list is also notably missing details on the status of ban/phase-out for hazardous chemicals. Miroglio also needs to show that it has adopted a "clean factory" approach to ensure that suppliers apply Detox across their whole mill, not only for the brand's products.

PFC elimination: Although Miroglio states unequivocally that items brought onto the market don't contain PFCs, it is not clear if it has achieved the elimination of PFCs 100% in its manufacturing supply chain. Its open approach, which includes the publication of testing results on products is encouraging.

Transparency: Miroglio reports that 80% of its global supply chain is reporting its Detox data, but does not provide a more precise breakdown of the percentage or number of facilities in by region.

Recommendations: Miroglio needs to publish the status of the bans/phase-outs of hazardous chemicals in its MRSL, as well as showing that it has adopted a "clean factory" approach to ensure that suppliers apply Detox across their whole mill, not only for the brand's products. As well as publishing its results on PFC product testing, it needs to share the results of waste water testing on PFCs to clarify what still needs to be addressed. Miroglio also should make transparent the number of facilities that are the publishing of their Detox data regularly and continuously, especially in China. It needs to publish a suppliers list which includes its wet processing facilities and make use of its suppliers Detox data by performing and sharing discharge trends analysis and root cause investigations.

Useful links

Webpage Miroglio group:
<http://www.mirogliogroup.com/>

Miroglio webpage, textile informations:
<http://www.mirogliogroup.com/it/miroglio-textile-sust-doc/>

Miroglio webpage, fashion informations:

<http://www.mirogliogroup.com/it/miroglio-fashion-sust-doc/>

Miroglio Detox Commitment with Greenpeace, September 2014: http://www.mirogliogroup.com/wp-content/uploads/2016/03/SOST_2014.09-MiroglioSPA-Commitment-on-chemical-management.pdf

Miroglio APEO investigation report, January 2016: http://www.mirogliogroup.com/wp-content/uploads/2016/03/SOST_2016.01-MiroglioText-Apeos-case-study.pdf

Miroglio APEOs case study Investigation into the current compliance to Apeos Ban, July 2015: http://www.mirogliogroup.com/wp-content/uploads/2016/05/SOST_2015.07-MiroglioFash-Apeos-case-study_new2.pdf

Miroglio Manufacturing Restricted Substances list, January 2016: http://www.mirogliogroup.com/wp-content/uploads/2016/03/SOST_2016.01-MiroglioFash-Manufacturing-restricted-substances.pdf

Miroglio Product Restricted Substances List (PRSL), December 2015 http://www.mirogliogroup.com/wp-content/uploads/2016/03/SOST_2015.12-MiroglioFash-Product-restricted-substances.pdf

Miroglio PFC investigation report, May 2016: http://www.mirogliogroup.com/wp-content/uploads/2016/05/SOST_2016.05-MiroglioFash-PFC-Risultato-screening-2015-EV.pdf

Miroglio water analysis February 2015:

http://www.mirogliogroup.com/wp-content/uploads/2016/03/SOST_2015.02-MiroglioText-Water-analysis-on-plants.pdf

Miroglio water analysis May 2015:

http://www.mirogliogroup.com/wp-content/uploads/2016/03/SOST_2015.05-MiroglioText-Water-analysis-on-plants.pdf

Miroglio Fashion, Communication to suppliers: http://www.mirogliogroup.com/wp-content/uploads/2016/03/SOST_2015.03-MiroglioSPA-Transparency-suppliers-information.pdf

Nike – Faux Pas

Detox 2020 plan: Although Nike was the first brand to have adopted a credible screening methodology and implement it via its Chemicals Management Programme, this has not been implemented in a credible way. Even though it uses the recommended GreenScreen hazard screening methodology, it adds its own ‘risk based approach’ to reduce hazardous chemicals, not to eliminate them. Its restrictions on hazardous chemicals in manufacturing use the flawed ZDHC MRSL (which has many gaps), and the only chemicals that Nike has added to its own MRSL are for footwear and equipment only, not apparel.

PFC elimination: Without any elimination targets for all PFCs, Nike’s commitment to Detox is not credible; although Nike has met its own limited target for eliminating all C8 PFCs and has phased out 90% of PFCs, there is no timeline for the elimination of all PFCs, which is still an inadequate response to the problems posed by such persistent and hazardous chemicals.

Transparency: There has been no progress since 2015; Nike has still not publicly disclosed the number and percentage of its suppliers that publish data on their discharges of hazardous chemicals. Its Chemical Data Transparency pilot project has been completed but is not reported transparently. However, it does publish an online interactive map of its suppliers. No further commitment has been made to investigate and ensure future publication of Detox data by its suppliers.

Recommendations: For Nike not to break its commitment to Detox by 2020 it needs to create its own MRSLS which proactively uses a hazard based screening methodology to select chemicals for elimination, beyond the first eleven groups and the limited additions made by the ZDHC. To transform its chemicals management programme to best practice. It needs to make credible commitments on all the above criteria that will implement a hazard-based approach to the elimination of hazardous chemicals throughout its manufacturing supply chain.

Useful links

Nike webpage on chemistry and zero discharge:

<http://www.nikeincchemistry.com/zero-discharge>

Nike Sustainable Business report 2014/2015:

http://s3.amazonaws.com/nikeinc/assets/56356/NIKE_FY14-15_Sustainable_Business_Report.pdf

Nike Roadmap to zero discharge, November 2011: <http://news.nike.com/news/nike-roadmap-toward-zero-discharge-of-hazardous-chemicals>

Nike Commitment on zero discharge, August 2011:

<http://news.nike.com/news/nike-inc-commitment-on-zero-discharge-of-hazardous-chemicals>

Nike Restricted Substances list (RSL):

<http://www.nikeincchemistry.com/restricted-substance-list/>

Zero discharge of hazardous chemistries:

<http://www.roadmaptozero.com/news/post/zdhc-chemical-registry/>

Nike sustainable chemistry guidance:

<http://www.nikeincchemistry.com/sustainable-and-green-chemistry>

Nike partners with bluesign technologies to scale sustainable textiles, March 2013:

<http://news.nike.com/news/nike-partners-with-bluesign-technologies-to-scale-sustainable-textiles>

Nike manufacturing map:

<http://manufacturingmap.nikeinc.com/#>

Nike, Inc.'s response to Greenpeaces report, July 2011:

<http://news.nike.com/news/nike-inc%E2%80%99s-response-to-greenpeace-report>

Nike, ambitions - double our business with half of the impact:

<http://about.nike.com/pages/our-ambition>

Nikes goals - minimize our environmental footprint:

<http://about.nike.com/pages/environmental-impact>

Primark – Evolution Mode

Detox 2020 plan: Primark provides a comprehensive update on its programme and describes its own programmes to work with suppliers on implementation; however, its use of the ZDHC's MRSL with its fundamental flaws is insufficient to achieve its Detox Commitment. The 'alignment' between Detox principles for hazard assessment methodology and the ZDHC MRSL is a problem as it is not hazard-based, it uses its own risk based interpretation to arbitrarily split the GreenScreen benchmark 1 criteria and it is not transparent.

PFCs elimination: Primark has achieved the elimination of PFCs within its deadline of December 2015. It has also published a case study which documents the process, however, a hazard assessment of the PFC-free alternative wasn't possible because the full composition was "not known." Primark is working on enforcement and states that potential cross contamination from other production lines is a challenge. This shows how essential it is to adopt a "clean factory" approach which is applied to the suppliers' whole factory – not just to Primark's own production.

Transparency: Primark states that it has "completed" its target for its global wet processing suppliers to report their Detox data on IPE ; however, the reporting isn't broken down by region. Its report investigating discharges of PFCs found no PFCs but did find APEOs, phthalates, heavy metals and chlorinated solvents, (all below 1 ppm). However, it's not clear how the root cause was investigated apart from a general statement that Primark is working with the mills to identify sources.

Recommendations: Primark needs create its own MRSL which proactively uses a hazard based screening methodology to select chemicals for elimination, beyond the first eleven groups and the limited additions made by the ZDHC. On PFCs it needs to continue to assess the elimination of PFCs by its suppliers to verify that they are not being used. On transparency Primark should ensure its suppliers continue to report their Detox data, provide a more detailed breakdown and to publish a list of its suppliers, which needs to include wet processing facilities.

Useful links

Primark ethical trade and chemical management report (Progress Report) 2015/2016:

<http://www.primark.com/~media/ourethics/manufacturing/primarkchemicalmanagementprogramme/statusonprogressandroadmap20152016.ashx?la=en>

Primark ethical webpage:

<http://www.primark.com/en/our-ethics/environment/chemical-management>

Zero Discharges of Hazardous Chemicals (ZDHC) MRSLv1.1:

<http://www.primark.com/en/our-ethics/environment/~media/ourethics/detox/pdfs/mrsl.ashx>

Primark Product Restricted Substances List (PRSL)

<http://www.primark.com/~media/ourethics/detox/pdfs/primark%20restricted%20substances%20list%20rsl.ashx?la=en>

Progress Report 2014/2015:

<http://www.primark.com/en/our-ethics/environment/~media/ourethics/detox/pdfs/detox-report/Detox-Progress-Report-2015.ashx?la=en>

Case Study NPEOs:

<http://www.primark.com/en/our-ethics/environment/~media/ourethics/detox/pdfs/case%20study%20-%20npeo.ashx?la=en>

Case Study PFCs:

<http://www.primark.com/en/our-ethics/environment/~media/ourethics/detox/pdfs/case%20study%20-%20pfoa.ashx?la=en>

Case Study Chlorophenols:

<http://www.primark.com/sitecore/shell/~media/ourethics/detox/pdfs/case%20study%20-%20chlorophenol.ashx?la=en>

2014 China's investigation phase I report in:

http://www.primark.com/~media/ourethics/detox/pdfs/primark%20pilot%20investigation_july2014.ashx?la=en

2015 China's investigation phase II report view in:

<http://www.primark.com/~media/ourethics/detox/china-pilot/china-pilot-further-investigation-summary-report-uk.ashx?la=en>

China's PFCs investigation report:

<http://www.primark.com/~media/ourethics/detox/pdfs/china-pilot-investigation/china-pilot-3-investigation-report.ashx?la=en>

Bangladesh's investigation report:

<http://www.primark.com/~media/ourethics/detox/pdfs/bangladesh-pilot-investigation/bangladesh-detox-pilot-2015-investigation.ashx?la=en>

Puma – Evolution Mode

Detox 2020 plan: Puma is still using the ZDHC's MRSL v.1.1 which is not hazard-based, not transparent and lacks wastewater testing detection limits and some key groups, such as PFCs. Even though Puma's own programme has some positive elements, such as its proactive chemicals management and suppliers engagement tools, it is undermined by the fundamentally flawed ZDHC MRSL.

PFCs elimination: Puma is still working on substituting the remaining PFCs it uses to meet its commitment to eliminate them by 2017; it states that it will be trialling some PFC-free water repellent fabric in its Autumn/Winter 2016 apparel collections.

Transparency: Puma reports that 82% of its apparel suppliers by volume, (and its main accessories suppliers, 61% of footwear leather and 69% of footwear fabric) have published their Detox waste-water testing online in 2015. Full details are also published on its website with links to the online data. It also publishes an exemplary suppliers list which includes its core component and material suppliers (Tier 2 and 3) in addition to our core manufacturers (Tier 1 suppliers).

Recommendations: Puma needs to set its own individual MRSL which implements a "clean factory" approach which would be applied to the supplier's whole factory, not just to its own production lines. This should be derived from a hazard-based screening methodology for the selection of chemicals for elimination, including "phase-out substances" with associated timelines, beyond the first eleven

groups and the limited additions made by the ZDHC. On PFCs, it still needs to publish a case study about its substitution of long-chain PFCs with PFC-free alternatives and ensure that a full hazards profiling of the alternatives is included in this. It also should provide its customers with information on which of its products contain PFCs and which are PFC free. Puma could improve further on transparency by publishing a discharge analysis report which include a root cause analysis of any sources of contamination.

Useful links:

Puma detox progress report on PFC and Disclosure :

<http://about.puma.com/en/sustainability/environment/zero-discharge-of-hazardous-chemicals>

Puma next public detox steps (renewed commitment), November 2014:

http://about.puma.com/damfiles/default/sustainability/environment/zdhc/PUMA-Renewed-Commitment_2015-970592bf01a6a71f4df5baa43e63ade4.pdf

Puma chemicals management:

<http://about.puma.com/en/sustainability/environment/chemicals-management>

Puma sustainability handbook

2016: http://about.puma.com/damfiles/default/sustainability/environment/chemicals-management-/PUMA-Sustainability-Handbook---Chemical-Management_20160525-db8eb06c06622e30afd0e03b16b75653.pdf

Puma suppliers list:

<http://about.puma.com/en/sustainability/supply-chain/public-factory-list>

Puma Global Core Factory List 2016:

http://about.puma.com/damfiles/default/sustainability/supply-chain/manufacturing-map/MasterList_CoreFactories_2016-332d9830bd2944558380c8ebd54fa09f.pdf

Valentino – Evolution Mode

Detox 2020 plan: While Valentino publishes its own MRSL this doesn't explain its use of a transparent screening methodology. The list is also notably missing some important PFCs (all telomere acids and alcohols), even though these are included in its Product RSL. However, its adoption of detection limits in line with best available technology is included.

PFC elimination: Valentino has undertaken a detailed investigation to examine the occurrence of PFCs in its supply chain which has found that PFCs are still present in a few cases. Although it states that no PFCs are used as from May 2015, it is not clear if Valentino has achieved the 100% elimination of PFCs. Its open approach, which includes the publication of a case study which examines alternatives using hazard assessment, is encouraging. However it needs to be more thorough in communicating its PFC ban to its suppliers by listing ALL PFCs in its MRSL and adopting a clean factory approach.

Transparency: Valentino reports that 60% of its Italian supply chain is reporting its Detox data, which represents about 60% of its global supply chain. Compared to 2015, it appears that less suppliers are reporting their data. It also does not yet publish a list of suppliers.

Recommendations: Valentino needs to include complete listings of chemicals such as PFCs in its MRSL for suppliers; to help enforce its elimination programme it should show that it has adopted a “clean factory” approach to ensure that suppliers apply Detox across their whole mill, not only for the brand’s products. To improve on transparency, it must ensure that suppliers update the publishing of their Detox data regularly and increase the percentage that is reporting. It also needs to publish a suppliers list which includes its wet processing facilities.

Useful links

Valentino Detox Corporate information:

<http://www.valentino.com/experience/en/pages/corporate-information/>

Valentino Final Fashion group detox solution commitment 2013:

http://valentino-dev.4me.it/cloudlink/connectors/resources/download/get/valentino/CS-CSJQ4E/IT/valentino_detox_solution_commitment-pdf

Valentino Fashion group detox solution commitment, update 2013:

http://valentino-dev.4me.it/cloudlink/connectors/resources/download/get/valentino/CS-CSJQ4E/IT/2013_detox_commitment_update-pdf

Valentino supply chain reporting and monitoring, November 2014:

http://valentino-dev.4me.it/cloudlink/connectors/resources/download/get/valentino/CS-CSJQ4E/IT/2014_detox_commitment_update-pdf

Valentino Detox Commitment update, October 2015:

http://valentino-dev.4me.it/cloudlink/connectors/resources/download/get/valentino/CS-CSJQ4E/IT/2015_detox_commitment_update-pdf

Valentino Detox Commitment update May 2016:

http://valentino-dev.4me.it/cloudlink/connectors/resources/download/get/valentino/CS-CSJQ4E/IT/2016_detox_commitment_update-pdf

Valentino Restricted Solution List (RSL), April 2015: http://valentino-dev.4me.it/cloudlink/connectors/resources/download/get/valentino/CS-CSJQ4E/IT/valentino_product_rsl_2-pdf

http://valentino-dev.4me.it/cloudlink/connectors/resources/download/get/valentino/CS-CSJQ4E/IT/valentino_product_rsl_2-pdf

Valentino Manufacturing Restricted Solution List (MRSL), April 2016 :

http://valentino-dev.4me.it/cloudlink/connectors/resources/download/get/valentino/CS-CSJQ4E/IT/valentino_manufacturing_rsl-pdf

Valentino Chemical Formulations, May 2016:

http://valentino-dev.4me.it/cloudlink/connectors/resources/download/get/valentino/CS-CSJQ4E/IT/vspa_chemical_formulations-pdf

Valentino Fashion Group APEOs investigation report 2013:

http://valentino-dev.4me.it/cloudlink/connectors/resources/download/get/valentino/CS-CSJQ4E/IT/2013_apeos_investigation_report-pdf

Valentino APEOs PFCs and phthalates investigation report 2014:

http://valentino-dev.4me.it/cloudlink/connectors/resources/download/get/valentino/CS-CSJQ4E/IT/2014_apeos_pfcs_phthalates_investigation_report-pdf

Valentino PFCs substitution case study 2016: http://valentino-dev.4me.it/cloudlink/connectors/resources/download/get/valentino/CS-CSJQ4E/IT/2016_pfcs_substitution_case_study-pdf

Valentino wastewater test result, May 2016:
http://valentino-dev.4me.it/cloudlink/connectors/resources/download/get/valentino/CS-CSJQ4E/IT/vspa_wastewater_test_results-pdf

Detox Catwalk, order of assessment

AVANT-GARDE

Inditex (Zara)

Benetton

H&M

EVOLUTION MODE

C&A

Fast Retailing (Uniqlo)

G-Star

Mango

Miroglio

Valentino

adidas

Burberry

LS & Co

Primark

Puma

M&S

FAUX PAS

Limited Brands (Victoria's Secret)

LiNing

Nike